

## North America Emissions Control Area (ECA) Report Instructions

### **ECA Fuel Oil Non-Availability Report Form**

Report Form ID: ECA0100

Issue Date: 01/23/2013

#### **Background**

On June 26, 2012, the Environmental Protection Agency (EPA) issued an Interim Guidance on the Non-Availability of Compliant Fuel Oil for the North American Emission Control Area (ECA). The interim guidance clarifies how the U.S. government will implement the fuel oil availability provisions contained in Regulation 18 of MARPOL Annex VI, and describes how an owner or operator of a vessel who cannot obtain compliant fuel oil can make a fuel oil non-availability claim through submittal of a Fuel Oil Non-Availability Report (FONAR). The Guidance also indicated that the EPA was in the process of implementing an electronic system to receive the FONARs. The EPA has now launched its Fuel Oil Non-Availability Disclosure portal (FOND). Persons wishing to submit FONARs to the EPA may now request a FONAR electronic form through the Fuel Oil Non-Availability Disclosure portal, and must submit the completed FONAR through this same electronic portal. For instructions on how to register and use the Fuel Oil Non-Availability Disclosure portal for any party wishing to submit a Fuel Oil Non-Availability Report to disclose potential violations of the North America ECA please see [EPA's Marine Enforcement webpage](#)

**Note:** The FONAR form (ECA0100) is only part of the complete FONAR (The components of the complete FONAR can be found below). Additionally, a new ECA0100 must be requested for each FONAR submission in the event of the form or form instructions have changed.

#### **Submitting a FONAR**

If you are making a claim regarding the non-availability of compliant fuel oil, you should submit your Fuel Oil Non-Availability Report to the United States government prior to entering the North American ECA. The report should be submitted as soon as you determine that you will be unable to procure and use compliant fuel oil upon entry into the North American ECA, but no later than 96 hours prior to entering the North American ECA. This document provides instructions on how to complete the ECA0100 prior to submittal of the complete FONAR to EPA through the FOND portal.

**Note:** The Environmental Protection Agency does not anticipate that any of the information you disclose will be considered confidential business information (CBI). However, should you wish to make a CBI claim, do not include any claimed CBI information in this electronic FONAR. Rather, you may submit a complete version of the FONAR, including any claimed CBI, via hard copy mail, to the address provided. Clearly mark the part or all of the information that you claim to be CBI. For any data you are claiming as CBI, please write "CBI" in the data field on the electronic FONAR. Any information submitted electronically will not be considered CBI.

## North America Emissions Control Area (ECA) Report Instructions

### **ECA Fuel Oil Non-Availability Report Form**

Issue Date: 01/23/2013

Report Form ID: ECA0100

#### **Mailing Address:**

U.S. Environmental Protection Agency  
Office of Civil Enforcement; Air Enforcement Division  
Marine ECA - Fuel Oil Non-Availability  
1200 Pennsylvania Ave N.W.  
Ariel Rios South Building, Mailcode 2242A  
Washington, D.C. 20460 (20004 for non-USPS couriers)

Please check the EPA's Clean Air Act National Enforcement Programs web site for information on Enforcement of MARPOL Annex VI: <http://www.epa.gov/enforcement/air/index.html#fuels>

**Note:** Please do NOT submit a FONAR if you have obtained and will be using North America Emission Control Area compliant fuel oil.

#### **FONAR Components**

Make sure you include the following in your Fuel Oil Non-Availability Report

**Note: It is highly recommended that you combine all files into a single compressed file.**

1. Completed ECA0100 FONAR form (csv or excel format);
2. A copy of the vessel's voyage plan (pdf or similar format);
3. List and contact information for fuel suppliers referenced in the form (pdf or similar format);
4. Additional Contact Information and any additional description or information (pdf or similar format); and
5. A list of all documents submitted to EPA and the certification statement (below) with signature (pdf or similar format).

"I certify under penalty of law that the statements and information made herein are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines and imprisonment pursuant to 18 U.S.C. § 1001."

[Designated Corporate Official Name]

[Designated Corporate Official Title]

[Designated Corporate Official Contact Information]

[Designated Corporate Official Signature]

## North America Emissions Control Area (ECA) Report Instructions

### **ECA Fuel Oil Non-Availability Report Form**

Issue Date: 01/23/2013

Report Form ID: ECA0100

Field No.	Field Name	Units	Field Formats, Codes, & Special Instructions
1.	Report Form ID		
2.	Ship Operator Name		OSG Ship Management (GR) Inc.
3.	Vessel Name		Overseas Petromar
4.	Flag Country		Majuro, Marshall Islands
5.	International Maritime Organization (IMO) Vessel ID Number		9222170
6.	Date of ECA First Notice		01/24/14
7.	Location of ECA First Notice		Freeport, Bahamas
8.	Name of Ports after ECA First Notice		At present NA

# North America Emissions Control Area (ECA) Report Instructions

## **ECA Fuel Oil Non-Availability Report Form**

Issue Date: 01/23/2013

Report Form ID: ECA0100

Field No.	Field Name	Units	Field Formats, Codes, & Special Instructions
9.	Name of Last Port before ECA Entry		Freeport, Bahamas
10.	Name of port with fuel oil supply disruption		NA
11.	Name of original fuel supplier with supply disruption		NA
12.	Number of fuel suppliers contacted		NA
13.	Date of Entry in the North American ECA		01/29/14
14.	Time of Entry in the North American ECA	24 hour	01:12
15.	Sulfur Content of Non-Compliant Fuel Oil	mass %	0.93 /0.95 % sulfur content, 329 mt 1.1 % sulfur content mixture, 130 mt 3.24 % sulfur content, 275 mt
16.	Projected Hours on Main Propulsion	hours	48

## North America Emissions Control Area (ECA) Report Instructions

### **ECA Fuel Oil Non-Availability Report Form**

Issue Date: 01/23/2013

Report Form ID: ECA0100

Field No.	Field Name	Units	Field Formats, Codes, & Special Instructions
17.	Name of First ECA Port-of-Call		<b>ST John, New Brunswick, Canada</b>
18.	Compliant Fuel Oil at First ECA Port-of-Call?		<b>Yes</b>
19.	Plan to Bunker Compliant Fuel Oil at First ECA Port-of-Call?		<b>Yes</b>
20.	Number of fuel suppliers contacted at First ECA Port-of-Call		<b>3 Suppliers Contacted</b>
21.	Name of Second ECA Port-of-Call		<b>Come By Chance, Newfoundland, Canada</b>
22.	Compliant Fuel Oil at Second ECA Port-of-Call?		<b>Yes</b>
23.	Plan to Bunker Compliant Fuel Oil at Second ECA Port-of-Call?		<b>Yes</b>

# North America Emissions Control Area (ECA) Report Instructions

## **ECA Fuel Oil Non-Availability Report Form**

**Issue Date:** 01/23/2013

**Report Form ID:** ECA0100

<b>Field No.</b>	<b>Field Name</b>	<b>Units</b>	<b>Field Formats, Codes, &amp; Special Instructions</b>
24.	Number of fuel suppliers contacted at the Second ECA Port-of-Call		<b>3 Suppliers Contacted</b>
25.	Date of Exit from North American ECA		<b>02/28/14</b>
26.	Time of Exit from the North American ECA	24 hour	<b>12:00</b>
27.	Has this vessel operated in the ECA in the last 12 months?		<b>Yes</b>
28.	Number of Separate Visits to the ECA		<b>See attached Port of Calls</b>
29.	Number of Ports visited in the ECA		<b>See attached Port of Calls</b>
30.	Previously submitted ECA0100 Reports?		<b>Yes</b>

## North America Emissions Control Area (ECA) Report Instructions

### **ECA Fuel Oil Non-Availability Report Form**

Issue Date: 01/23/2013

Report Form ID: ECA0100

Field No.	Field Name	Units	Field Formats, Codes, & Special Instructions
31.	Number of Submitted Reports		1
32.	Designated Corporate Official Name		Captain Vasileios Ioannou - DPA
33.	Designated Corporate Official E-mail		<u>Vloannou@osg.com</u> / GRSafety@osg.com
34.	Designated Corporate Official Phone		+302109119322 / +306057207323
35.	Description of Actions to Achieve Compliance, Additional Issues, Comments, or Other Information		Vessel was loading at Come By Chance, Canada. Have contacted bunkers suppliers in order to stem LSFO, however, were advised that same is not available at the current port. Meanwhile, have received orders from charterers to discharge at NY. Contacted bunker suppliers MONJASA Inc. in order to deliver LSFO at NY.

Sample CSV report line:

ECA0100, Operator 1,Vessel 123,US,IMO-1234567, 8/30/2012, Singapore, Port7;Port8,Port 8, NA, NA, NA, 9/5/2012, 13:50,1.5,36,Baltimore, Y,Y,NA,NA,NA,NA,NA, 9/10/2012,20:15,N,NA,NA,N,1, Mr.Designated Official,designatedofficial@epa.gov,001-202-564-XXXX,Attached